

ADDENDUM TO PETITION (Probation Form 12)

RE: Demetrius Tray'Von Ware

Case No.: 2:20CR00029

December 1, 2022

The Honorable Richard F. Boulware, United States District Judge
Las Vegas

Honorable Judge:

Reference is made to the Probation Form 12, dated November 10, 2022, alleging violations of supervision. We are requesting that the petition be amended to include the following:

4. Do Not Commit Another Crime - You must not commit another federal, state or local crime.

On November 7, 2022, Ware committed the offenses of Assault, a misdemeanor, in violation of Nevada Revised Statute 200.471.2a, and Provoke Breach of Peace, a misdemeanor, in violation of Nevada Revised Statute 203.030 through Citation # 1-05842290.

On Tuesday, November 8th, 2022 at approximately 0730 hours, while on duty at Palo Verde HS, 333 S. Pavilion Center Dr., Las Vegas, NV. 89144, Officer K. Roberts #590 was notified by Principal L. Schumacher of a disturbance on campus and possible adult to student "Assault" which had taken place the day before.

On Monday, November 7th, 2022 at approximately 1437 hours, on the Palo Verde High School Campus, Student Success Office Secretary (Traci Perriman) had escorted student Ayanna White from the SSO down to the flagpole area at the front of the school. Upon arrival to Ayanna's Mother (Fatima Hooper) and vehicle, Ayanna failed to enter the vehicle and leave property as instructed by Perriman. According to Perriman, Ayanna was looking (glaring) in the direction of a group of students where student Aniyah Welch was seated. Ayanna and Aniyah were involved in a verbal confrontation earlier in the day. Perriman states Ayanna asked her mother if she could "fight" the other girl. Ayanna's mother said no.

At that time an adult male later identified as Demetrius Ware got out of the vehicle. Instead of assisting Perriman put Ayanna in the car and leaving campus, he walked toward the group of girls. Ware is the "Stepfather" of Ayanna. Ware approached the group, reportedly with his hands in the front of his pants, and stated in a reportedly forceful tone, "Which one of ya'll is it? Which one of ya'll wants to fight my baby?" Aniyah was already on the phone with her mother when she saw Ware start walking toward her/the group. Aniyah raised her hand in response to Ware's question.

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Ware approached Aniyah. Several witnesses report Ware was approximately 3-6 inches away from Aniyah and was talking in a manner they perceived as threatening and/or caused them to be fearful for Aniyah's safety. Aniyah's mother reports she could hear a man yelling at her daughter over the phone and was greatly concerned for her daughter's safety.

About that time, Principal L. Schumacher, Assistant Principal M. Sarver and Assistant Principal K. Barra arrived to the front of the school. For the protection of Aniyah, Schumacher inserted herself between Ware and the juvenile female student (Aniyah). Meanwhile, Ayanna had walked away from her vehicle Perriman had escorted her to and over to Ware, located near Aniyah, the other girls and school staff. Ayanna was yelling and screaming about fighting Aniyah. Aniyah began to yell back at Ayanna. Ayanna and Ware's actions greatly escalated the situation into a hazardous scene.

While Ayanna was yelling and charging around administration, Ware stood and watched. Ware made no attempt to control his stepdaughter. Ayanna was throwing punches wildly and struck Principal Schumacher in the back. Admin separated Aniyah and Ayanna. Ware walked back to his vehicle. Ayanna was escorted back to her vehicle. Ware, Ayanna, and Ayanna's mother (Fatima Hooper) eventually left school property in that vehicle.

Based on the fact Ware intentionally approached a female juvenile in a manner physically and verbally that caused her to fear for her immediate safety, multiple witnesses state Ware's close proximity to the victim, physical size difference, along with tone of voice caused fear in them for the victims immediate safety, Ware failed to responsibly take his daughter off school property and schedule a meeting for another day, confronted a juvenile female student creating an environment for his daughter to re escalate an already hostile situation, resulting in a disturbance at the front of the school where many students were frightened, requiring six administrators and a school secretary to respond and become involved resulting in two administrators being struck, Ware was issued a citation and charged with: Assault, in violation of NRS 200.471.2a and Provoke Breach of Peace, in violation of NRS 203.030. Citation # 1-05842290 was sent to Las Vegas Justice Court.

5. Must Answer Truthfully - You must answer truthfully the questions asked by your probation officer.

On November 14, 2022, Ware telephonically contacted the undersigned officer to inform that he had law enforcement contact the week prior at Palo Verdes High School. Ware stated he would be contacting Clark County School Police District Police in the next upcoming days for questioning on a matter in which his daughter was being bullied at the school. The undersigned officer questioned Ware if he was being investigated or

questioned for committing any new law violations. Ware failed to inform that he was issued a citation regarding the matter.

6. Report Police Contact Within 72 Hours - If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.

On November 14, 2022, Ware telephonically contacted the undersigned officer to inform that he had law enforcement contact the week prior at Palo Verdes High School. Ware failed to inform the undersigned officer within 72 hours of the law enforcement contact and failed to advise he was cited for criminal conduct.

EVALUATIVE SUMMARY

On November 10, 2022, a Petition for Summons was submitted to Your Honor alleging Ware violated his terms and conditions for supervision regarding positive drug tests, missing drug testing, missing substance abuse counseling and violating his curfew schedule on location monitoring.

Due to the conduct contained in this addendum as well as the petition for summons dated November 10, 2022, in conjunction with his history of violence and weapon offenses, Ware is considered a danger to the community. It is noted the instant offense involved Ware carrying a firearm on school grounds. It is alarming that Ware chose to confront a female teenager on school grounds and create a dangerous situation instead of being a responsible adult and leaving with his stepdaughter. Ware is a criminal history category IV and has a significant history of substance abuse. As noted in the petition, it is requested Ware appear before Your Honor to show cause why supervision should not be revoked.

Respectfully submitted,

Nickie Pipilakis
United States Probation Officer

Approved:

Todd J. Fredlund
Supervisory United States Probation Officer

